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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ROBERT LAFON,

14 Defendant.

Case No. 2:15-cr-231-KJD-CWH

STIPULATION AND PROPOSED
ORDER TO MODIFY THE
CONDITIONS OF PRE-TRIAL
RELEASE

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Alexandra M. Michael, Assistant United States Attorney, counsel
18 for the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender,
19 counsel for Robert Lafon, that the conditions of Mr. Lafon's pre-trial release be modified to
20 include removing both the GPS monitoring and home detention conditions.

21 This Stipulation is entered into for the following reasons:

22 1. Mr. Lafon was released on a personal recognizance bond on February 1, 2016.
23 (CR# 47.) The Court released Mr. Lafon, in part, because the district court granted Mr. Lafon's
24 Motion to Suppress Evidence (CR#20; CR#43), and the Government thereafter filed a
25 Protective Notice of Appeal (#44).
26

1 2. Since Mr. Lafon's release, he has been completely compliant with all his
2 conditions of release and followed all the orders of Pre-Trial Services. Mr. Lafon has been
3 attending substance abuse counseling, is currently taking class in connection with a local union,
4 and just attended an orientation for employment with that union.

5 3. Currently, Mr. Lafon is wearing two ankle bracelets, a GPS/location monitoring
6 bracelet and a TAD bracelet to monitor alcohol consumption. Undersigned counsel for the
7 defense reached out to Samira Barlow, Mr. Lafon's Pre-Trial Services officer, about removing
8 one of his bracelets given his compliance to-date. Ms. Barlow indicated that Pre-Trial Services
9 has no opposition to the removal of his GPS monitoring bracelet and his home detention
10 condition. Given Mr. Lafon's substance abuse history, Pre-Trial believes that it would be
11 prudent to keep the TAD bracelet in-tact at this time.

12 4. Given Mr. Lafon's compliance and the fact that neither Pre-Trial Services nor
13 the Government oppose this request, Mr. Lafon respectfully request that this Court modify his
14 conditions and remove both the GPS monitoring and home detention conditions.

15 DATED this 21st day of April, 2016

16 RENE L. VALLADARES
17 Federal Public Defender

 DANIEL G. BOGDEN
 United States of America

18 By: /s/ Heidi A. Ojeda

By: /s/ Alexandra M. Michael

19 HEIDI A. OJEDA
20 Assistant Federal Public Defender
21 Attorney for Robert Lafon

 ALEXANDRA M. MICHAEL
 Assistant Unites States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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6 ROBERT LAFON,

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ORDER

8
9 **ORDER**

10 IT IS HEREBY ORDERED, that the conditions of Mr. Lafon's pre-trial release
11 conditions be modified to include removing both the GPS monitoring and home detention
12 conditions.
13

14 DATED this 22nd day of April, 2016.

15 

16 UNITED STATES MAGISTRATE JUDGE